

CLAIM 1

Claim 1 is directed toward:

An electronic device, comprising:
a display showing an image; and
a navigation sensor, whereby movement of said electronic device relative to a surface in close proximity to said navigation sensor is sensed by said navigation sensor and said movement includes moving said display and said movement produces a change in said image that is showing on said display.

Some portions of claim 1 that are not disclosed by Jun Rekimoto have been replicated above in bold type.

In summary, the Applicant does not understand how Jun Rekimoto discloses a "surface" as claimed in claim 1. The Applicant respectfully requests that this "surface" be identified so that an appropriate amendment may be made or the issues for appeal may be isolated. Jun Rekimoto discloses tilting a device. There is no mention in Jun Rekimoto regarding a surface as claimed in claim 1.

On page 2 of the Office Action, the following statement is made in reference to Jun Rekimoto:

They are using a tilt as the input method corresponding to a navigation sensor.

The Applicant respectfully notes that there is no mention of "tilt" as an input for navigation in claim 1. Rather, claim 1 recites, in part:

...whereby movement of said electronic device relative to a surface in close proximity to said navigation sensor is sensed by said navigation sensor...

Thus, claim 1 is directed, in part, toward sensing movement of the electronic device relative to a surface. Again, the Applicant does not understand how this

movement relative to a surface has any bearing on tilting a device as disclosed by Jun Rekimoto.

In order to further establish that Jun Rekimoto does not disclose "whereby movement of said electronic device relative to a surface in close proximity to said navigation sensor is sensed by said navigation sensor" as claimed in claim 1, the Applicant notes that Jun Rekimoto does not mention moving the electronic device relative to a surface.

Jun Rekimoto refers to measuring tilt by use of gyros, inclinometers, and compasses. None of these items measures movement relative to a surface. For example, a gyro measures tilt relative to the center of the earth and has nothing to do with the motion of the device relative to a surface. The same applies to an inclinometer. A compass measures a magnetic field and has nothing to do with the movement of an object relative to a surface.

The Applicant respectfully notes that the Office Action relies on some unexplained correlation between the claims and "tilt" as used in Jun Rekimoto. However, "tilt" is not relevant because it is not claimed in claim 1 or any of the other claims.

In order for a rejection to stand under 35 U.S.C. §102(b), the reference must include all the elements of the claim. Clearly, the Jun Rekimoto reference does not include all the elements of claim 1 or any other pending claim. Therefore, the rejection of claim 1 is not proper.

The Applicant respectfully requests allowance of the claim.

CLAIMS 2-56

Claims 2-56 all include some sort of movement relative to a surface or a part of a user. None of the claims rely on the "tilt" as defined in the Jun Rekimoto reference. Accordingly, the Applicant respectfully requests reconsideration of the rejections.

In view of the above, all of the pending claims are now believed to be in condition for allowance and a notice to that effect is earnestly solicited.

Respectfully submitted,
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